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8 Attorneys for Defendants  
CLEM-TRANS, INC.; GLORY CLEMONS-  
BROWN; GEOVANY MARTINEZ, MANUEL  
9 A. SOLORZANO; JOSE CASTRO;  
SALVADOR VILLALOBOS;  
10 and Counter-Defendant-in-Intervention JESSE  
CRUZ  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA, SOUTHERN DIVISION

JESSE CRUZ, an Individual; MARIA CRUZ,  
an Individual; GEOVANY MARTINEZ, an  
Individual,

Plaintiffs,

v.

DANNY DURBIN, an Individual;  
CHAMPION TRANSPORTATION  
SERVICES, INC. a foreign corporation;  
CHAMPION LOGISTICS GROUP, INC., a  
foreign corporation; DOES I through XX,  
inclusive; and ROE BUSINESS ENTITIES I  
through XX, inclusive,

Defendants.

Case No. 2:11-cv-00342-LDG-VCF

CONSOLIDATED WITH:

2:12-cv-00051-LDG-VCF

And

2:12-cv-01627-JAD-CWH

**STIPULATION AND ORDER FOR  
DISMISSAL**

1 LEXINGTON INSURANCE COMPANY, as  
2 Subrogee for Champion Transportation  
Services, Inc.,

3 Counter-Claimant/Intervenor,

4 v.

5 JESSE CRUZ, an Individual,

6 Counter-Defendant-in-  
7 Intervention.

8  
9 KAREN J. WILSON, Individually and as  
Independent Administrator of the Estate of  
10 LARRY A. WILSON, a Deceased Person ,

11 Plaintiffs,

12 v.

13 JESSE R. CRUZ, Individually and as Agent of  
Clem-Trans, Inc., a foreign corporation;  
14 GEOVANY MARTINEZ, Individually and as  
Agent of Clem-Trans, Inc., a foreign  
15 corporation; JOSE CASTRO, Individually and  
as Agent of Clem-Trans, Inc., a foreign  
16 corporation; SALVADOR VILLALOBOS,  
Individually and d/b/a Villalobos Trucking and  
17 as Agent of Clem-Trans, Inc., a foreign  
corporation; SALVADOR SOLORZANO,  
Individually and d/b/a SS Trucking, and as  
18 Agent of Clem-Trans, Inc., a foreign  
corporation; MANUEL A. SOLORZANO,  
19 Individually and d/b/a Manuel A. Solorzano  
Trucking, and as Agent of Clem-Trans, Inc., a  
20 foreign corporation; GLORY CLEMONS-  
BROWN, Individually and as Agent of Clem-  
21 Trans, Inc., a foreign corporation, URISTAS  
TRANSPORTS, INC., a foreign corporation  
22 MAS TRUCKING, INC., a foreign  
corporation; CLEM-TRANS, INC., a foreign  
23 corporation; MATHESON FAST FREIGHT,  
INC., a foreign corporation; MATHESON  
24 POSTAL SERVICES, INC., a foreign  
corporation; MATHESON TRUCKING, INC.,  
25 a foreign corporation; DEPENDABLE  
HIGHWAY EXPRESS, INC., a foreign  
26 corporation, Individually and as Successor-in-  
interest to Matheson Trucking Inc.; DOE(S)  
27 (INDIVIDUALS) II-X and ROE(S)  
CORPORATION(S) LIMITED LIABILITY  
28 COMPANIE(S) AND OTHER CORPORATE

1 ENTITIE(S)) XIII-XX, inclusive,  
2 Defendants.

3  
4 JESSE CRUZ, an individual; MARIA CRUZ,  
5 an individual; GEOVANY MARTINEZ, an  
individual;

6 Plaintiffs,

7 v.

8 WABASH NATIONAL CORPORATION;  
9 DOES I through XX, INCLUSIVE; and ROE  
BUSINESS ENTITIES I through XX,  
10 inclusive,

11 Defendants.

12 IT IS HEREBY STIPULATED by the parties above named, by and through their respective  
13 counsel of record, that the above-entitled matter identified as case number 2:12-cv-00051-LDG-VCF  
14 be dismissed with prejudice, including specifically:

15 A. Defendant JESSE R. CRUZ, Individually, as Agent of CLEM-TRANS, INC., a foreign  
16 corporation;

17 B. Defendant GEOVANY MARTINEZ, Individually and as Agent of CLEM-TRANS,  
18 INC., a foreign corporation (hereinafter "MARTINEZ");

19 C. Defendant JOSE CASTRO, Individually and as Agent of CLEM-TRANS, INC., a  
20 foreign corporation (hereinafter "CASTRO");

21 D. Defendant SALVADOR VILLALOBOS, Individually, dba SS Trucking, and as Agent  
22 of CLEM-TRANS, INC., a foreign corporation (hereinafter "VILLALOBOS");

23 E. Defendant MANUEL A. SOLORZANO, Individually, dba Manuel A. Solorzano  
24 Trucking, and as Agent of CLEM-TRANS, INC. a foreign corporation (hereinafter "SOLORZANO");

25 F. Defendant GLORY CLEMONS-BROWN, Individually and Agent of CLEM-TRANS,  
26 INC., a foreign corporation (hereinafter "CLEMONS-BROWN"); and

27 G. Defendant CLEM-TRANS, INC., a foreign corporation (hereinafter "CLEM-  
28 TRANS").

1 H. Defendant URISTAS TRANSPORTS, INC., a foreign corporation;  
 2 I. MAS TRUCKING, INC., a foreign corporation;  
 3 J. MATHESON FAST FREIGHT, INC., a foreign corporation;  
 4 K. MATHESON POSTAL SERVICES, INC., a foreign corporation;  
 5 L. MATHESON TRUCKING, INC., a foreign corporation;  
 6 M. DEPENDABLE HIGHWAY EXPRESS, INC., a foreign corporation, Individually and  
 7 as Successor-in-interest to Matheson Trucking Inc.;

8 It is hereby further stipulated that the Lexington Insurance Company's Counter-Claim-in-  
 9 Intervention against Counterdefendant-In-Intervention, Jesse Cruz, in case number 2:11-cv-00342-  
 10 LDG-VCF also be dismissed with prejudice.

11 Trial in this matter has not been scheduled. Each party is to bear their own fees and costs.

12 Dated this 18<sup>th</sup> day of December, 2014.

Dated this 18<sup>th</sup> day of December, 2014.

13 //s// Anne E. Padgett

//s// Todd A. Bresney

14 Anne E. Padgett, Esq.

Todd A. Bresney, Esq.

15 MCCORMICK BARSTOW

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*Attorneys for Defendants*

*Attorneys for Plaintiff*

17 *Clem-Trans, Inc., Glory Clemons-Brown;*

*Karen Wilson*

*Geovanny Martinez, Manuel A. Solorzano, Jose*

18 *Castro, Salvador Villalobos and Counter-*

*Defendant-in-Intervention Jesse Cruz*

19 Dated this 18<sup>th</sup> day of December, 2014.

Dated this 18<sup>th</sup> day of December, 2014.

20 //s// Christian Gabroy

//s// Loren S. Young

Christian Gabroy, Esq.

Loren S. Young, Esq.

21 GABROY LAW OFFICES

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*Attorneys for Defendant*

23 *Karen Wilson*

*Jesse Cruz*

1 Dated this 18<sup>th</sup> day of December, 2014.

2 //s// Michael E. Hottman  
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 3 Michael E. Hottman, Esq.  
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 4 2820 W. Charleston Blvd., Ste 19B  
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 5 ***Attorneys for Defendants***  
***Danny Durbin, Navistar, Inc. & Champion***  
***Transportation Services, Inc.***

7 Dated this 18<sup>th</sup> day of December, 2014.

8 //s// Richard Young  
 Richard Young, Esq.  
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 10 Las Vegas, Nevada 89107  
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***Lexington Insurance Co.***

12 Dated this 18<sup>th</sup> day of December, 2014.

13 //s// Ronald D. Rosengarten  
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***Imperium Insurance Co.***

18 Dated this 22<sup>nd</sup> day of December, 2014.

19 //s// Patrick McKnight  
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 20 7473 W. Lake Mead Boulevard, Ste. 100  
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 21 ***Attorneys for Plaintiffs***  
***Jesse Cruz, Maria Cruz & Geovany Martinez***

Dated this 18<sup>th</sup> day of December, 2014.

//s// Reeve J. Segal  
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Dated this 18<sup>th</sup> day of December, 2014.

//s// Ramzy P. Ladah  
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***Jesse Cruz, Maria Cruz & Geovany Martinez***

Dated this 22<sup>nd</sup> day of December, 2014.

//s// Douglas W. Rennie  
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***Transportation Services, Inc.***

1 Dated this 22<sup>nd</sup> day of December, 2014.

2 //s// Brian E. Holthus

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4 3800 Howard Hughes Parkway, 16<sup>th</sup> Floor  
Las Vegas, Nevada 89169

5 *Attorneys for Intervenor*  
*Imperium Insurance Co.*

7 **ORDER**

8 IT IS SO ORDERED.

9 DATED this 23 day of December, 2014.

  
DISTRICT COURT JUDGE  
LLOYD D. GEORGE